

**EXHIBIT B**



Steve Buckanavage    HIGHLY CONFIDENTIAL  
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1    '96 when you were in the market strategy department, your  
2    group.

3            A.    Okay.

4            Q.    Okay? While you were in this group, what  
5    analysis or research did you do regarding the use of free  
6    samples?

7            A.    None.

8            Q.    To what extent during this time period did you  
9    analyze the effect of samples on return to practice?

10          A.    None.

11          Q.    Did you ever have any discussions with anyone  
12    regarding that issue?

13          A.    No.

14          Q.    Did you have any understanding about policies  
15    that Zeneca had in place regarding the use of samples?

16          A.    Yes.

17          Q.    What was your understanding?

18          A.    That samples were made available for clinicians  
19    to try on patients and gain some clinical experience with  
20    our therapeutics, and that was a way to also get them  
21    comfortable with prescribing medications. And that's how  
22    we intended to use them.

Henderson Legal Services  
(202) 220-4158